

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

GOVERNMENT OF THE UNITED)
STATES VIRGIN ISLANDS)

Plaintiff,)

v.)

JPMORGAN CHASE BANK, N.A.)

Defendant/Third-Party Plaintiff.)

Case Number: 1:22-cv-10904-JSR

JPMORGAN CHASE BANK, N.A.)

Third-Party Plaintiff,)

v.)

JAMES EDWARD STALEY)

Third-Party Defendant.)

**DECLARATION OF DAVID I. ACKERMAN IN SUPPORT OF
GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS'
RESPONSE TO DEFENDANT'S LOCAL CIVIL RULE 56.1(B)
COUNTERSTATEMENT OF ADDITIONAL MATERIAL FACTS**

Pursuant to 28 U.S.C. § 1746, I, David I. Ackerman, declare under penalty of perjury as follows:

1. I am a member in good standing of the bars of the State of New York, the State of New Jersey, and the District of Columbia, and am admitted to practice before this Court. I am one of the attorneys representing the Government of the United States Virgin Islands in the above-captioned action. I am a Member of the law firm of Motley Rice LLC, and my office is located at 401 9th Street NW, Suite 630, Washington, DC 20004. I am familiar with the facts set forth herein and if called as a witness, I could and would competently testify thereto. I submit this Declaration

and the attached Exhibits in support of United States Virgin Islands' Response to Defendant JPMorgan Chase Bank N.A.'s Local Civil Rule 56.1(b) Counterstatement of Additional Material Facts.

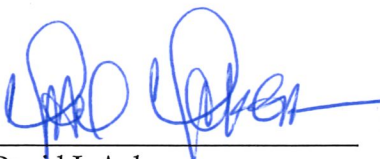
2. Attached hereto are true and correct copies of the following:

Exhibit Number	Description
Exhibit 304	Transcript excerpts of the Deposition of Jean-Pierre Oriol , taken May 16, 2023, in this Action.
Exhibit 305	Transcript excerpts of the Deposition of Albert Bryan, Jr. , taken on June 6, 2023, in this Action.
Exhibit 306	Transcript excerpts of the Deposition of Jean-Pierre Oriol (as 30(b)(6) designee) , taken on July 7, 2023, in this Action.
Exhibit 307	Transcript excerpts of Deposition of Stacey Plaskett , taken on May 9, 2023, in this Action.
Exhibit 308	Transcript excerpts of the Deposition of Kenneth E. Mapp , taken on May 24, 2023, in this Action.
Exhibit 309	Transcript excerpts of the Deposition of John de Jongh, Jr. , taken on May 30, 2023, in this Action.
Exhibit 310	Transcript excerpts of the Deposition of Shani A. Pinney (as 30(b)(6) designee) , taken on July 18, 2023, in this Action.
Exhibit 311	Transcript excerpts of Deposition of Cecile de Jongh , taken on May 29, 2023, in this Action.
Exhibit 312	Transcript excerpts of the Deposition of Carol Thomas-Jacobs , taken on July 13, 2023, in this Action.
Exhibit 313	Transcript excerpts of the Deposition of Vincent Frazer , taken on July 13, 2023, in this Action.
Exhibit 314	Transcript excerpts of the Deposition of Denise George , taken on July 17, 2023, in this Action.
Exhibit 315	Transcript excerpts of the Deposition of Denise George , taken on July 20, 2023, in this Action.
Exhibit 316	Transcript excerpts of the Deposition of Inais Borque , taken on May 26, 2023, in this Action.

Exhibit 317	Transcript excerpts of the Deposition of Margarita Benjamin (as 30(b)(6) designee) , taken on May 26, 2023, in this Action.
Exhibit 318	Transcript excerpts of the Deposition of Margarita Benjamin (as 30(b)(6) designee) , taken on July 14, 2023, in this Action.
Exhibit 319	Transcript excerpts of the Deposition of Sandra Bess , taken on May 17, 2023, in this Action.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 14, 2023



David I. Ackerman